

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE LUIS J. VAZQUEZ URQUIA Debtor	BANKRUPTCY 19-01041 BKT ADVERSARY # 20-0057 CHAPTER 7
NANCY J. GARGULA, U.S. TRUSTEE for Region 21 Plaintiff  vs  LUIS J. VAZQUEZ URQUIA Defendant	
DEFENDANT's <i>Second</i> REQUEST FOR EXTENSION OF TIME to ANSWER COMPLAINT	

TO THE HONORABLE COURT:

COMES NOW debtor DEFENDANT through his legal representation and respectfully prays thus:

1. On May 7, 2020 at doc #1, Plaintiff, NANCY J. GARGULA, U.S. Trustee filed a 31-page *Complaint* which should be answered by extension on or before **July 14, 2020**.
2. Debtor previously sought and obtained additional time due to the extensiveness of the *Complaint's* 137 paragraphs, and its 5 counts of objections. Notwithstanding, it has been impossible to complete the Answer under the circumstances of the pandemic, and more recently a recurring eye condition that has not allowed counsel for defendant to correct her vision, other than through use of her contact lens during one entire week, until yesterday. With this recurring eye condition, counsel has no other means of correcting her vision due to the long years she has been using contact lenses and is disabled from reading or using the computer.
3. Under the circumstances counsel has not be able to adequately draft an Answer and research affirmative defenses to so many counts under §727 as alleged in the *Complaint* for completion prior to July 14<sup>th</sup>, 2020, especially without our support staff currently unable to work remotely from her home or to work at our office.
4. Under these circumstances, debtor requests an extension of time of at an additional 30 days to complete and submit the *Answer* and/or dispositive motion to Trustee's *Complaint* or on at least before **August 13, 2020**

WHEREFORE, debtor respectfully requests an extension of time to respond to Trustee's *Complaint* filed at doc #1 and/or file a dispositive pleading, or until at least, **August 13, 2020**.

NOTICE

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (I) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE of SERVICE that on this same date I electronically filed the foregoing with the Clerk of the Court using the CmEcf Filing System which will send a notification, upon information and belief, of such filing to the following:

MONSITA LECAROS ARRIBAS [ustpreregion21.hr.ecf@usdoj.gov](mailto:ustpreregion21.hr.ecf@usdoj.gov)

UNITED STATES TRUSTEE [ustpreregion21.hr.ecf@usdoj.gov](mailto:ustpreregion21.hr.ecf@usdoj.gov)

In Caguas, Puerto Rico, this 13<sup>th</sup> day of July 2020.

s/ *L.A. Morales*

LYSSETTE MORALES VIDAL  
USDC PR #120011

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